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6 Attorneys for Defendant
JESUS RAMON CAMPOS

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,

13 vs.

14 JESUS RAMON CAMPOS,
15 Defendant.

Case No. 2:22-CR-00010-WBS

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; FINDINGS AND
ORDER**

DATE: March 20, 2021
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

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18 **STIPULATION**

19 Defendant, JESUS RAMON CAMPOS, by and through his counsel of record, and
20 Plaintiff, United States of America, hereby stipulate as follows:

- 21 1. By previous order, this matter was set on March 20, 2023.
- 22 2. By this stipulation, defendant now moves to continue the status conference until March
- 23 27, 2023 at 9:00 a.m., and to exclude time between March 20, 2023 and March 27, 2023,
- 24 under Local Code T4.
- 25 3. The parties agree and stipulate, and request that the Court find the following:
- 26 a) The government has represented that the discovery associated with this case includes
- 27 Spanish audio recordings, reports, and photographs. This discovery has been either
- 28 produced directly to counsel and/or made available for inspection and copying.

- b) Counsel for the defendant needs additional time to review the discovery, meet with her client to discuss the discovery and how the evidence impacts resolution and sentencing options, conduct independent factual investigation, and discuss a potential plea agreement.
 - c) The status requested for March 27, 2023 has the potential to be converted into a change of plea hearing.
 - d) Counsel for the defendant believes that the failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - e) The government does not object to the continuance.
 - f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
 - g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of March 20, 2023, to March 27, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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1 IT IS SO STIPULATED.

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3 Respectfully submitted,

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5 HEATHER E. WILLIAMS
6 Federal Defender

7 Dated: March 10, 2023

8 /s/ Meghan D. McLoughlin
MEGHAN D. McLOUGHLIN
9 /s/ Mia Crager
MIA CRAGER
10 Assistant Federal Defenders
Attorney for Defendant
JESUS RAMON CAMPOS


11 Dated: March 10, 2023

12 /s/ Cameron L. Desmond
CAMERON L. DESMOND
13 Assistant United States Attorney

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17 **ORDER**

18 **IT IS SO FOUND AND ORDERED.**

19 Dated: March 10, 2023

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WILLIAM B. SHUBB
21 UNITED STATES DISTRICT JUDGE
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